

Hearing Date: February 7, 2018, 9:30 a.m. (Atlantic Standard Time)  
Objection Deadline: January 23, 2018, 4:00 p.m. (Atlantic Standard Time)

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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In re: PROMESA  
THE FINANCIAL OVERSIGHT AND Title III  
MANAGEMENT BOARD FOR PUERTO RICO, No. 17 BK 3283-LTS  
as representative of (Jointly Administered)  
THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,  
Debtors.<sup>1</sup>  
-----X

In re: PROMESA  
THE FINANCIAL OVERSIGHT AND Title III  
MANAGEMENT BOARD FOR PUERTO RICO, No. 17 BK 3283-LTS  
as representative of  
THE COMMONWEALTH OF PUERTO RICO, **NOTICE OF MOTION**  
Debtor.  
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**PLEASE TAKE NOTICE**, that the American Federation of State, County and Municipal Employees International Union, AFL-CIO (“AFSCME”) and the American Federation of Teachers, AFL-CIO (“AFT”), International Union, on behalf of themselves, their local affiliates in Puerto Rico and their members (collectively, the “Unions” or “CBA Counterparties”), through their undersigned counsel, will move this Court before the Honorable Laura Taylor Swain, United States District Judge, at the United States District Court for the District of Puerto Rico, José V. Toledo Federal Building and United States Courthouse, 300

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Recinto Sur Street, San Juan, PR 00901, on February 7, 2018 at 9:30 a.m. Atlantic Standard Time, or as soon thereafter as counsel may be heard, for an Order pursuant to 11 U.S.C. §§ 105 and 362 with respect to the processing through resolution of employment arbitration and grievance proceedings and granting such other relief as the Court deems proper and just.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion shall (i) be made in writing; (ii) conform to the Bankruptcy Rules and the Local Rules for the United States District Court for the District of Puerto Rico; (iii) set forth the basis for the objections and the specific grounds therefor; (iv) be filed with this Court with copies to the chambers of the Honorable Laura Taylor Swain, together with proof of service thereof; and (v) be served in a manner as to be received by the undersigned counsel by 4:00 p.m. Atlantic Standard Time seven (7) days prior to the hearing date.

Dated: January 16, 2018

/s/ Curtis C. Mechling  
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and

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*For American Federation of Teachers,  
AFL-CIO, as authorized agent for the  
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*For the American Federation of State,  
County and Municipal Employees*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of January, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will notify all counsel of record and caused to be mailed or emailed a copy, as provided in the Court-approved Case Management Procedures in this case.

Dated: January 16, 2018

/s/José Luis Barrios-Ramos  
José Luis Barrios-Ramos